

# Exhibit A

**IN THE STATE COURT OF FULTON COUNTY  
STATE OF GEORGIA**

**HALIMAH BARLOW,**

Plaintiff,

v.

**HONG BIN ZHANG, individually; LINK  
US TRANSPORTATION INC., and  
AMERICAN SENTINEL INSURANCE  
COMPANY,**

Defendants.

**JURY TRIAL DEMANDED**

**CIVIL ACTION**

**FILE NO. \_\_\_\_\_**

**COMPLAINT**

COMES NOW HALIMAH BARLOW, (hereinafter referred to as “Plaintiff”) and file this Complaint for Damages against HONG BIN ZHANG, individually; LINK US TRANSPORTATION INC., and AMERICAN SENTINEL INSURANCE COMPANY (hereinafter referred to as “Defendants”) as follows:

**PARTIES AND JURISDICTION**

1.

Plaintiff HALIMAH BARLOW is a resident of the State of Georgia.

2.

Defendant HONG BIN ZHANG is a citizen and resident of the State of CALIFORNIA, who resides at 1928 HAWAII ST, WEST COVINA, LOS ANGELES COUNTY, CALIFORNIA 91792-2458 and may be served with a Summons and Complaint as allowed by law.

3.

Defendant LINK US TRANSPORTATION INC. is a Domestic Stock Corporation existing under the laws of the State of California with its principal place of business in California and may be served by and through its registered agent, HONGFEI LU, 12429 Denholm Drive El Monte, California 91732.

4.

AMERICAN SENTINEL INSURANCE COMPANY is a Foreign Corporation existing under the laws of Georgia with its principal place of business in Pennsylvania and may be served through its registered agent CT Corporation at 289 S. Culver St, Lawrenceville, GA 30046-4805.

5.

Jurisdiction and venue are proper in this court.

### **BACKGROUND**

6.

On or about March 15, 2020, Plaintiff was a passenger in a 2019 Hyundai Accent.

7.

On March 15, 2020, Defendant Zhang was the driver of a 2016 Freightliner.

8.

On this date, Defendant Zhang was operating his tractor-trailer on behalf of Defendant Link Us Transportation Inc.

9.

On March 15, 2020, at approximately 9:19 p.m. Plaintiff sustained severe injuries when Defendant Zhang was following too closely and collided with the vehicle in which Plaintiff was a passenger.

10.

As a result of the collision, Plaintiff suffered severe and permanent injuries.

**COUNT 1**  
**NEGLIGENCE**

11.

Plaintiff realleges and incorporates herein the allegations contained in paragraphs 1 through 10 above as if fully restated.

12.

Defendant Zhang was negligent in the following manner:

- (a) In failing to make reasonable and proper observations while operating the freightliner, or if reasonable observations were made, failing to act thereon;
- (b) In driving the freightliner in reckless disregard for the safety of persons and/or property
- (c) In Following Too Closely

13.

Defendant Zhang was negligent in failing to maintain a proper lookout for the vehicle in which the Plaintiff was a passenger in and colliding with said vehicle.

14.

Defendant Zhang's negligence is the sole and proximate cause of the collision, and Plaintiff's resulting injuries.

**COUNT 2**  
**IMPUTED LIABILITY**

15.

Plaintiff realleges and incorporates herein the allegations contained in paragraphs 1 through 14 above as if fully restated.

16.

At the time of the subject collision, Defendant Zhang was under dispatch for Defendant Link Us Transportation Inc.

17.

At the time of the subject collision, Defendant Zhang was operating his vehicle on behalf of Defendant Link Us Transportation Inc.

18.

Defendant Link Us Transportation Inc. is an interstate motor carrier, and pursuant to federal and state laws, is responsible for the actions of Defendant Zhang in regard to the collision described in this complaint under the doctrine of lease liability, agency or apparent agency.

**COUNT 3**

**NEGLIGENT HIRING, TRAINING & SUPERVISION**

19.

Plaintiff realleges and incorporates herein the allegations contained in paragraphs 1 through 18 above as if fully restated.

20.

Defendant Link Us Transportation, Inc. was negligent in hiring Defendant Zhang and entrusting him to drive a tractor-trailer.

21.

Defendant Link Us Transportation, Inc. was negligent in failing to properly train Defendant Zhang.

22.

Defendant Link Us Transportation, Inc. was negligent in failing to properly supervise Defendant Zhang.

23.

Defendant Link Us Transportation, Inc.'s negligence in hiring Defendant Zhang entrusting him with driving a commercial vehicle and failing to train and supervise him properly was the sole and proximate cause of the collision, and Plaintiff's resulting injuries.

**COUNT 4**

**DIRECT ACTION**

24.

Plaintiff realleges and incorporates herein the allegations contained in paragraphs 1 through 23 above as if fully restated.

25.

Defendant American Sentinel Insurance Company is subject to a direct action as the insurer for Defendant Link Us Transportation, Inc. pursuant to O.C.G.A. § 40-2-140 or its predecessor O.C.G.A. § 46-7-12.1.

26.

Defendant American Sentinel Insurance Company was the insurer of Defendant Link Us Transportation, Inc. at the time of the subject incident and issued a liability policy to comply with the filing requirements under Georgia law for interstate transportation.

27.

Defendant American Sentinel Insurance Company and Defendant Link Us Transportation, Inc. are subject to the filing requirements outlined in O.C.G.A. § 40-2-140 or its predecessor O.C.G.A. § 46-7-12.1.

28.

Defendant American Sentinel Insurance Company is responsible for any judgment rendered against defendant Link Us Transportation, Inc. and Defendant Zhang up to its policy limits of coverage.

**COUNT 5**  
**DAMAGES**

29.

Plaintiff realleges and incorporates herein the allegations contained in paragraphs 1 through 28 above as if fully restated.

30.

As a result of Defendants' negligence, Plaintiff suffered neck pain, back pain, chest pain and headaches.

31.

As a result of Defendants' negligence, Plaintiff has incurred past medical expenses and will continue to incur future medical expenses.

32.

As a result of Defendants' negligence, Plaintiff has been unable to work and has a claim for past and future lost wages.

33.

Defendants' negligence is the sole and proximate cause of Plaintiff's injuries.

**COUNT 6**

**PUNITIVE DAMAGES**

34.

Plaintiff realleges and incorporates herein the allegations contained in paragraphs 1 through 33 above as if fully restated.

35.

Defendants' conduct was reckless, willful and wanton, and demonstrates a conscious indifference to the consequences of their actions and entitles Plaintiff to an award of punitive damages.

WHEREFORE, Plaintiff prays that she has a trial on all issues and judgment against Defendants as follows:

- a. That Plaintiff recover the full value of past and future medical expenses and past and future lost wages in an amount to be proven at trial;
- b. That Plaintiff recover for physical and mental pain and suffering in an amount to be determined by the enlightened conscience of a jury;
- c. That Plaintiff recover punitive damages in an amount to be determined by the enlightened conscience of a jury; and
- d. That Plaintiff recover such other and further relief as is just and proper.

This 14<sup>th</sup> day of March, 2022.

Respectfully submitted,



Ross Moore II  
Georgia Bar No. 142987  
Chelsea Heron  
Georgia Bar No. 698094  
Attorneys for Plaintiff

ROSS MOORE II, P.C.  
309 N. Highland Ave. NE, Suite A  
Atlanta, GA 30307  
(404) 445-8122  
(Phone & Fax)

**DISCOVERY SERVED WITH COMPLAINT**



GEORGIA, FULTON COUNTY

DO NOT WRITE IN THIS SPACE

**STATE COURT OF FULTON COUNTY**  
 Civil Division

CIVIL ACTION FILE #: \_\_\_\_\_

Halimah Barlow c/o Ross Moore II., PC  
 309 North Highland Ave., NE Suite A  
 Atlanta, GA 3 30307

Plaintiff's Name, Address, City, State, Zip Code

vs.

Hong Bin Zhang, individually; Link US  
 Transporation INC., and American Ser

Defendant's Name, Address, City, State, Zip Code

**SUMMONS**

TO THE ABOVE NAMED-DEFENDANT:

American Sentinel Insurance Company Registered Agent: CT Corporation 289 S. Culver St, Lawrenceville, GA 30046-4805

You are hereby required to file with the Clerk of said court and to serve a copy on the Plaintiff's Attorney, or on Plaintiff if no Attorney, to-wit:

Name: Ross Moore II., PC.Address: 309 North Highland Ave., NECity, State, Zip Code: Atlanta, GA 30307Phone No.: 404-445-8122

An answer to this complaint, which is herewith served upon you, must be filed within thirty (30) days after service, not counting the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint, plus cost of this action. **DEFENSES MAY BE MADE & JURY TRIAL DEMANDED**, via electronic filing or, if desired, at the e-filing public access terminal in the Self-Help Center at 185 Central Ave., S.W., Ground Floor, Room TG300, Atlanta, GA 30303.

Christopher G. Scott, Chief Clerk (electronic signature)

**SERVICE INFORMATION:**

Served, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

DEPUTY MARSHAL, STATE COURT OF FULTON COUNTY

WRITE VERDICT HERE:

We, the jury, find for \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_. \_\_\_\_\_ Foreperson

(STAPLE TO FRONT OF COMPLAINT)

GEORGIA, FULTON COUNTY

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| TYPE OF SUIT  | AMOUNT OF SUIT      |
|---|---------------------|
| <input type="checkbox"/> ACCOUNT                            | PRINCIPAL \$ _____  |
| <input type="checkbox"/> CONTRACT                           |                     |
| <input type="checkbox"/> NOTE                               | INTEREST \$ _____   |
| <input type="checkbox"/> TORT                               |                     |
| <input type="checkbox"/> PERSONAL INJURY                    | ATTY. FEES \$ _____ |
| <input type="checkbox"/> FOREIGN JUDGMENT                   |                     |
| <input type="checkbox"/> TROVER                             | COURT COST \$ _____ |
| <input type="checkbox"/> SPECIAL LIEN                       |                     |
| *****   |                     |
| <input type="checkbox"/> NEW FILING                         |                     |
| <input type="checkbox"/> RE-FILING: PREVIOUS CASE NO. _____ |                     |

**SUMMONS**

TO THE ABOVE NAMED-DEFENDANT: HONG BIN ZHANG 1928 HAWAII ST, WEST COVINA, LOS ANGELES COUNTY, CALIFORNIA 91792-2458

You are hereby required to file with the Clerk of said court and to serve a copy on the Plaintiff's Attorney, or on Plaintiff if no Attorney, to-wit:

Name: Ross Moore II., PC.Address: 309 North Highland Ave., NECity, State, Zip Code: Atlanta, GA 30307Phone No.: 404-445-8122

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Plaintiff's Name, Address, City, State, Zip Code

vs.

Hong Bin Zhang, individually; Link US

Transportation INC., and American Sentinel Insurance Company

Defendant's Name, Address, City, State, Zip Code

| TYPE OF SUIT  | AMOUNT OF SUIT      |
|---|---------------------|
| <input type="checkbox"/> ACCOUNT                            | PRINCIPAL \$ _____  |
| <input type="checkbox"/> CONTRACT                           |                     |
| <input type="checkbox"/> NOTE                               | INTEREST \$ _____   |
| <input type="checkbox"/> TORT                               |                     |
| <input type="checkbox"/> PERSONAL INJURY                    | ATTY. FEES \$ _____ |
| <input type="checkbox"/> FOREIGN JUDGMENT                   |                     |
| <input type="checkbox"/> TROVER                             | COURT COST \$ _____ |
| <input type="checkbox"/> SPECIAL LIEN                       |                     |
| *****   |                     |
| <input type="checkbox"/> NEW FILING                         |                     |
| <input type="checkbox"/> RE-FILING: PREVIOUS CASE NO. _____ |                     |

**SUMMONS**

TO THE ABOVE NAMED-DEFENDANT: Link US Transportation Inc Registered Agent, HONGFEI LU, 12429 Denholm Drive El Monte, California 91732

You are hereby required to file with the Clerk of said court and to serve a copy on the Plaintiff's Attorney, or on Plaintiff if no Attorney, to-wit:

Name: Ross Moore II., PC.

Address: 309 North Highland Ave., NE

City, State, Zip Code: Atlanta, GA 30307

Phone No.: 404-445-8122

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